IN THE CHANCERY COURT OF LEWIS COUNTY AT HOHENWALD, TENNESSEE

In Re:	Sentinel Trust Company	•	}	
) .	Case No. 4781
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MOTION FOR AN ORDER AUTHORIZING THE FILING UNDER SEAL OF THE DEPOSITION OF VIVIAN LAMB AND EXHIBITS TO THIS DEPOSITION AND ALLOWING USE OF CONFIDENTIAL INFORMATION THEREIN IN CONNECTION WITH BEARING

American Senior Living Limited Pattnership ("ASLLP") and Chancellor Hoalth Partners, Inc. ("Chancellor") move the Court-for entry of an order, authorizing the filing under seal of the Deposition of Vivian Lamb and the Exhibits to this Deposition and for use of confidential information therein in connection with a heading in this case. In support of this Motion, Movants respectfully state as follows:

- 1. As authorized by the Court the deposition of Vivian Lamb was taken on July 12, 2004 pursuant to agreement between the Receiver and the parties present therefor that the documents made exhibit to her deposition and the information contained therein would be kept confidential.
- No prior request for the relief sought in this motion has been made to this or any other court.

WHEREFORE, Movants respectfully request that the Court enter an order, (i) authorizing the filing under seal of the Deposition of Vivian Lamb, as well as all exhibits thereto and (ii) granting such other relief as the Court decins proper, including permitting the use of the information in the deposition and exhibits in support of the Motion of American Senior Living Limited Partnership and Chancellor Health Partners, Inc. to Amend the Court's Orders, Dated

265247.1/12874.1

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July 19, 2004 Approving (A) the Transfer of Pre-May 18 Fiduciary investment Accounts and (B)
Transfer of Personal Estate and Trusts to Replacement Executor and Trustee, and to Transfer
All Verified Assets at the hearing on this Motion now scheduled for August 9, 2004.

Respectfully submitted;

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